

UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

IN RE:	:	
Maria A. Townes	:	
	:	Chapter 13
	:	
Debtor	:	Case No.: 16-16498

MOTION TO RECONSIDER ORDER MODIFYING AUTOMATIC STAY

Comes Now Maria A. Townes, hereinafter referred to as "Debtor" and moves this Honorable Court to vacate its June 20, 2017 Order Modifying Section 362 Automatic Stay and in support thereof avers the following:

1. The above captioned bankruptcy matter was filed as a Chapter 13 on or about September 14, 2016.
2. The Chapter 13 bankruptcy matter was assigned case number 16-16498.
3. The Chapter 13 Plan was confirmed by this Honorable Court on March 29, 2017.
4. On or about May 19, 2017 Reverse Mortgage Solutions, as "Movant" filed a Motion for Relief from the Automatic Stay.
5. Debtor was ill and failed to file an answer to the Motion for Relief.
6. On or about June 20, 2017, this Honorable Court signed an Order Modifying the Section 362 Automatic Stay in favor of Movant.
8. Debtor is desirous of maintaining her interest in the real property known as and located at 614 Washington Avenue, Media, Pennsylvania 19063.
9. The May 19, 2017 Motion for Relief alleged in primary part that the Debtor failed and continued to fail to secure Homeowner's insurance on the subject real property.

10. At all times relevant hereto, the subject real estate was properly insured.

WHEREFORE, for the reasons stated herein, the Debtor respectfully requests that this Honorable Court Vacate its June 20, 2017 Order Modifying the Automatic Stay.

Respectfully submitted,

Dated: August 2, 2017

/s/ Brad J. Sadek, Esquire
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